



EXCEL·NET

E X C E L L E N T I N T E R N E T

2103 Indiana Avenue
Phone: (920) 452-0455 or (888) 489-9995

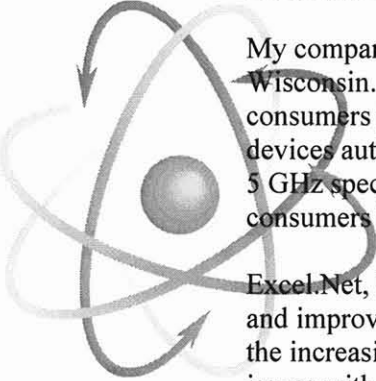
Sheboygan, WI 53081
Fax: (920) 452-8118

September 15, 2010

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: TV White Spaces
ET Docket Nos. 04-186 and 02-380

Dear Ms. Dortch:



My company, Excel.Net, Inc., provides fixed wireless broadband service in southeastern Wisconsin. We rely primarily on unlicensed spectrum to deliver broadband services to consumers that have few broadband choices. We built our network from scratch using devices authorized under Part 15 rules the FCC adopted to open up 900 MHz, 2.4 GHz and 5 GHz spectrum for unlicensed broadband devices. Thanks to the Commission's initiatives, consumers in the southeastern Wisconsin area can now get broadband service.

Excel.Net, Inc. is very interested in utilizing television white spaces so that we can expand and improve service. Having this spectrum available will allow us to move services from the increasingly "cluttered" bands that we currently have available. This is not typically issues with other WISP devices, but more of an issue with consumer level devices that are not behaving appropriately. We would also expect coverage areas to be greatly expanded using this proposed space and broadband services to be increased. We are committed to deploying as soon as equipment for point-to-multipoint service is commercially available.

I am pleased that the FCC will be acting on TV white space petitions for reconsideration in the near future. There are several proposals that would help us to deploy service:

First, the FCC should allow WISPs to operate using base station antennas mounted higher than 30 meters, and we should be allowed to install customer antennas (CPE) at heights below 10 meters. If we could increase our base station antenna height to 100 meters, we could cover three times more area with a base station and reduce our equipment, tower acquisition and tower lease fees by a large amount – an amount that could be the difference between deploying and not deploying in an area. We support the WISPA and Motorola proposals to increase base station height. By removing any minimum CPE height restrictions, we would not have to put tall masts on residences and we would be able to provide service at a lower cost.

Excellent Internet

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September 15, 2010

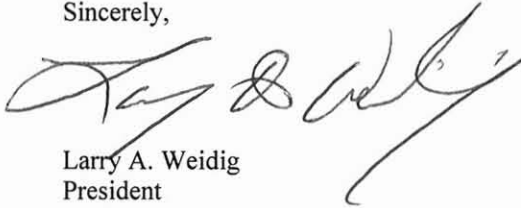
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Second, we believe we should be allowed to operate with power in excess of 4 Watts EIRP in rural areas. As is the case with tower height, operating with higher power will give us a greater coverage area and we will not need to spend as much money on infrastructure.

Third, we are very concerned about a proposal made by FiberTower and others to license white space spectrum for point-to-point wireless backhaul. Not only would adopting this proposal take six channels (36 MHz) and perhaps more channels away from us, but WISPs also would have to protect these licensed links. Moreover, channels and areas far beyond the links would be blocked because the signals from the licensed links would overshoot the path and the endpoints. This is due to the low-cost, low-gain antennas FiberTower wants to use. We also would not deploy if a licensed point-to-point user could come along later and put us out of business with a licensed link. We support the views expressed by WISPA in their September 8 letter and ask the FCC to reject the FiberTower proposal.

I would like to personally thank you for your consideration and diligence in this matter. The ability for our nation's broadband infrastructure to be increased both in coverage area and speed/quality by companies like Excel.Net, Inc. rely on the items discussed above. We look forward to being part of our countries Internet evolution!

Sincerely,

A handwritten signature in black ink, appearing to read 'Larry A. Weidig', with a stylized flourish extending from the end.

Larry A. Weidig
President